

August 4, 2008

Ross Johnson, Chairman Fair Political Practices Commission 428 J Street, #620 Sacramento, California 95814

RE: Opposition to Adoption of Amendments to Regulation 18946.4

Dear Chairman Ross,

The California Center for Civic Participation is a non-partisan 501(c) 3 organization that organizes the California Roast fundraising dinner each year. I'm writing to express our opposition to adoption of amendments to regulation 18946.4 that will be considered at the Thursday August 14, 2008 meeting of the Commission.

The proposed elimination of the "no value" reporting rule for tickets to non-profit fundraisers that would be replaced by a requirement to report the "full admission cost if the ticket is paid for or received from a person other than the nonprofit organization" will put a damper on revenue from our annual event. As you know elected officials--those on the panel and those in our audience--are the primary draw for our paying customers.

Proceeds from our event support our civic engagement programs for youth that *help strengthen our democracy* in California. Our event provides a once a year opportunity for the capital community to enjoy the bi-partisan "comity" that is harder to find these days. In some ways, the unique nature of the event itself helps strengthen our democracy.

We recognize that events organized by dubious non-profits provide interest groups with opportunities to take advantage of our current system by usurping spending limits in other realms. This is a legitimate concern of the Commission. However, it is frustrating to be lumped together with those groups and to (potentially) suffer the consequences.

Mr. Chairman, thank you for your consideration of our concerns. I hope the Commission can achieve the intention of this proposed amendment without "throwing the babies out with the bathwater". Thank you for your work on behalf of California.

James Muldavin, Executive Director

Sincerely

CC: Commission Counsel William J. Lenkeit

General Counsel Scott Hallabrin.